IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:)	
)	
Bradley C. HANSON, et al.)	Examiner: Unassigned
)	
Application No.: Unassigned)	Group Art Unit: Unassigned
(U.S. National Phase Application)	
corresponding to International Application)	Confirmation No.: Unassigned
No. PCT/US2006/011148, filed March 24,)	
2006))	
)	
Filed: August 23, 2006)	Date: August 23, 2006
)	
For: INFORMATION MANAGEMENT)	
SYSTEM AND METHOD)	

PETITION TO MAKE SPECIAL

Mail Stop Petition
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Applicants hereby petition to make the above-identified national phase application, which has not received any examination by an Examiner, special, pursuant to M.P.E.P. §708.02(VIII). All of the claims in the present application are directed to a single invention. If it is determined that all the claims presented herein are not directed to a single invention, then the Applicants will make an election without traverse as a prerequisite to the grant of special status.

Searches have been made in the following areas: class **235** (registers), subclass **380** (credit or identification card systems); and class **705** (data processing: financial, business practice, management, or cost/price determination), subclasses **1** (automated electrical financial or business practice or management arrangement), **26** (electronic shopping (e.g., remote ordering)), **35** (finance, e.g., banking, investment or credit), **39** (including funds transfer or credit transaction), **41** (having programming of a portable memory device (e.g., IC

Customer No.: 27160

card, "electronic purse")), **42** (remote banking (e.g., home banking)), and **44** (requiring authorization or authentication). Searches have also been conducted on computer using the Internet, ESPACENET (EPO), DELPHION and the PTO EAST/WEST databases.

Submitted herewith is a copy of an Information Disclosure Statement and Form PTO-1449, citing the relevant references. Pursuant to M.P.E.P. § 708.02(VIII)(D), copies of the references deemed most closely related to the subject matter have also been provided. A detailed discussion of the references deemed most relevant is set forth in Attachment A hereto. Inclusion of a reference in this Petition, Attachment A, the Information Disclosure Statement or the Form PTO-1449 does not constitute an admission on the part of the Applicants as to whether the references are prior art for purposes of assessing patentability under 35 U.S.C. §§ 102 and 103.

The fee required by 37 C.F.R. §1.17(h) is to be charged to deposit account 50-1710 in the amount of $130. Please charge any additional fees due associated with the submission of this Petition, or credit any overpayments, to this same deposit account.

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Should the Patent Office have any questions regarding this Petition or the application in general, the Patent Office is urged to contact the Applicants' attorney, Andrew J. Bateman, by telephone at (202) 625-3547. All correspondence should continue to be directed to the address given below.

Respectfully submitted,

By: _____

Andrew J. Bateman
Attorney for Applicants
Registration No. 45,573

Attachments: Attachment A;
Information Disclosure Statement and Form PTO-1449;
One copy each of the references cited in Form PTO-1449.

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PETITION TO MAKE SPECIAL
ATTACHMENT A

The following is a detailed discussion of the references believed to be most closely related to the subject matter encompassed by the claims of the present application and how the claimed subject matter is distinguishable over the references. Inclusion of a reference in the present attachment A does not constitute an admission on the part of the Applicants as to whether the references are prior art for purposes of assessing patentability under 35 U.S.C. §§ 102 and 103.

A.   DISCUSSION OF REFERENCES

1.   **U.S. Patent No. 5,945,653 to Walker *et al.*** (the '653 Patent). The '653 Patent is directed to a system and method for establishing and executing functions to affect credit card accounts and transactions. More particularly, the system and method enable merchants to offer customers a variety of financing options on an ad hoc basis. For example, a merchant might wish to offer an interest free purchase option to a customer allowing him to conveniently make a major purchase using one of his existing credit card accounts. The customer is not forced to apply for a store credit card simply to obtain better financing terms,

such as an interest free period. The customer and the merchant do not have to waste resources and time to process a store credit card application which the customer may not want or need in the first place. More importantly, the merchant does not have to risk losing a sale, because a customer that already had available lines of credit with his credit cards was denied a store credit card.

Accordingly, the '653 Patent teaches a system and process for establishing a function having a corresponding function identifier. The function is adapted to be processed during a transaction, such as a point-of-sale transaction, that may involve a credit card. The system and process involve identifying an account having an account identifier, establishing a function having a function identifier, and receiving a transaction request including the account identifier, a transaction amount, and the function identifier. The system and process also process the transaction in accordance with the function to affect the transaction and, possibly, the transaction amount. Additionally, the system and process are adapted to allow messages to be presented by customers and credit card holders during a transaction for later appearance on a credit card statement or other notice.

2.   **U.S. Patent No. 5,960,412 to Tackbary *et al.*** (the '412 Patent). The '412 Patent is directed to a method and apparatus for communicating with a card distribution center for management, selection, and delivery of social expression cards. More particularly, the method and apparatus use a computer system for permitting buyers to communicate with a card distribution center for selecting, ordering, and sending social expression cards and for maintaining records of intended recipients, occasion dates and orders made. The user selects a recipient from a recipient database in which at least a name and an address of the recipient is stored in the database. The user selects a card from a card database based upon the selected recipient name and based upon a card-giving occasion stored in a master occasion database. The selected recipient name and card-giving occasion appear on a video display device as textual and graphical images.

Accordingly, the '412 Patent teaches a system for communicating with a card distribution center for selecting, ordering, and sending social expression cards using a personal computer. The user can enter names and addresses of card recipients into the

system in which the information is maintained in a database. The system displays digitized images of the cards on a display screen that are retrieved from a card database. From the cards displayed, the user can select cards for designated recipients and enter personalized messages and a digitized signature. The user can then send the order to a card distribution center that processes the order, retrieves and prints the selected card images, including any user messages or user signature, and mails the cards to designated recipients or customers The system maintains a database of all recipients, addresses, associated occasions and dates, card preferences, relationships and order history.

3.   **U.S. Patent No. 5,984,180 to Albrecht** (the '180 Patent). The '180 Patent is directed to method and system for gift credit cards. More particularly, the '180 Patent teaches a system and method for providing purchasable value in the form of a credit instrument. A purchaser authorizes an institution (hereafter, the "sponsoring institution") with which the purchaser has a consumer credit account (hereafter, the "primary account") to create a secondary account within or linked to the primary account. The purchaser defines an expenditure limit (hereafter, the "authorized value") and at least one authorized user for the secondary account. The authorized value, and any service charge, can be charged immediately upon authorization to the primary account. Alternatively, the amounts of the transactions made by the authorized user in using the secondary account can be posted to the purchaser's primary account as such transactions are made. After authorization by the purchaser, the sponsoring institution issues a credit instrument (hereafter the "gift credit card") to the authorized user or users. The gift credit card is linked only to the secondary account and can only be used to purchase goods or services up to the limit of the secondary account that was determined by the authorization of the purchaser. The authorized user can use the gift credit card at any retail or other location that honors credit instruments issued by the sponsoring institution or a credit processing network to which the sponsoring institution belongs.

4.   **U.S. Patent No. 6,594,644 to Van Dusen** (the '644 Patent). The '644 Patent is directed to an electronic gift certificate system. More particularly, the system provides an

electronic gift certificate system that improves the efficiency and reliability of the redemption process. The system distributes electronic gift certificates in the form of e-mail documents that include hyperlinks for automating the redemption process. When a gift certificate recipient clicks on such a hyperlink, the recipient's computer automatically transmits a claim code or other identification information to the merchant's Web site. The site responds by automatically crediting the recipient's personal account with the gift certificate amount. When the recipient subsequently makes a purchase from the merchant's Web site, the recipient's account balance is automatically applied to the purchase price.

5.   **U.S. Patent No. 6,636,833 to Flitcroft** *et al.* (the '833 Patent). The '833 Patent is directed to a credit card system and method. More particularly, a credit card system is provided that has the added feature of providing additional limited-use credit card numbers and/or cards. These numbers and/or cards can be used for a single transaction, thereby reducing the potential for fraudulent reuse of these numbers and/or cards. The credit card system finds application to "card remote" transactions, such as by phone or Internet. Additionally, when a single use credit card is used for "card present" transactions, so called "skimming" fraud is eliminated. Other features that enhance the credit card system will allow secure trade without the use of elaborate encryption techniques.

6.   **U.S. Patent No. 6,957,746 to Martin** *et al.* (the '746 Patent). The '746 Patent is directed to apparatuses and methods for dispensing magnetic cards, integrated circuit cards, and other similar items. More particularly, a card dispensing apparatus includes at least first and second card hoppers and a movable card carriage. The card carriage is movable between a first position proximate to the first card hopper and a second position proximate to the second card hopper. The card carriage is configured to receive a first card from the first card hopper when in the first position and a second card from the second card hopper when in the second position. The card carriage can dispense at least the first card into a card outlet chute when the first card has been sufficiently read by a card reader. Alternatively, the card carriage can dispense the first card into a card escrow chute when the first card has not been sufficiently read by the card reader.

7.   **U.S. Patent No. 7,014,104 to MacFarlane *et al.*** (the '104 Patent). The '104 Patent is directed to a gift matching method. More particularly, a method for electronically transferring an amount of money from an initiator to a receiver is taught. The amount is enhanced or matched by a matching party. In one step, transfer information is received from the initiator. The transfer information includes at least two of a third party identifier, a second party identifier and the amount. The transfer information is analyzed. An enhancing amount to transfer from the matching party to the receiver is determined. Money is transferred to the receiver that corresponds to the amount and the enhancing amount.

8.   **U.S. Patent Application Publication No. 2001/0049655 to Bellosguardo** (the '655 Published Application). The '655 Published Application is directed to an anonymous credit card. More particularly, the anonymous credit card has a unique identification number and a card value that is exhausted when the cash amount of the card is expended. The card is sold by a first vendor and accepted by a second vendor when presented by the user. It is managed by an issuing institution that verifies the presence of sufficient funds to cover the cost charged and deducts the charge cost from the card value. The card has a limited monetary value, which is advantageous if it is lost or stolen. No connection exists between the card and its owner. As a result, the owner's credit rating cannot be tarnished by actions of a third party.

9.   **U.S. Patent Application Publication No. 2002/0013766 to Kumaki** (the '766 Published Application). The '766 Published Application is directed to a commercial settlement system with prepaid type credit card. More particularly, a commercial settlement system is provided using a novel prepaid credit card that can easily be owned by any one, can be used extensively for transactions like a credit card, and can suppress a criminal risk and damage. The commercial transaction settlement system using a prepaid credit card includes a financial agency for providing an accounting bankbook, and issuing at least one prepaid credit card for which a usable maximum amount is set within an accounting amount of the accounting bankbook or a sum of the usable maximum amounts is set within the accounting

amount. The financial agency automatically pays from the bankbook and settles the commercial transaction in the same manner as a credit card by the transaction using the prepaid credit card. The settlement record of the commercial transaction is displayed on the bankbook. The commercial transaction settlement system also includes a goods/service provider for being paid from the bankbook of a holder of the prepaid credit card to thereby settle the commercial transaction using the prepaid credit card.

10.   **U.S. Patent Application Publication No. 2002/0100797 to Hollingsworth** *et al.* (the '797 Published Application). The '797 Published Application is directed to a gift card envelope. More particularly, the '797 Published Application teaches a gift card supporting a prepaid credit card. The gift card can consist of single or multiple panels. The credit card is secured to the gift card, or can be contained in a pocket formed by multiple panels of the card. The gift card can contain one or more accent apertures, highlighting one or more areas of the credit card. It can also contain one or more operational slots depending on the combination of types of credit cards and gift cards. The multiple panel cards are securely affixed by a closure mechanism, ensuring that the credit card will remain inside the gift envelope.

11.   **U.S. Patent Application Publication No. 2002/0032605 to Lee** (the '605 Published Application). The '605 Published Application is directed to a system and method for providing a selectable gift certificate. More particularly, the '605 Published Application teaches a system for providing gift certificates that comprises a user terminal and a server coupled to the user terminal via the Internet. The server is configured to provide to the user terminal an interface for enabling a user of the user terminal to purchase a first gift certificate, also referred to as a Supercertificate™. The server comprises a transmission means for transmitting the first gift certificate to a recipient, such as by e-mail message when the first gift certificate is digital, or by mail when the first gift certificate is physical. The first gift certificate is redeemable by the recipient for a second gift certificate, such as a merchant gift certificate, selected by said recipient. The user can select a category to be associated with the first gift certificate, and the recipient redeems the first gift certificate for a second gift

certificate that corresponds to the selected category.

12.   **U.S. Patent Application Publication No. 2002/0194124 to Hobbs** *et al.* (the '124 Published Application). The '124 Published Application is directed to a system and method for a prepaid card issued by a foreign financial institution. More particularly, the '124 Published Application teaches a system and method for providing a reloadable prepaid card account maintained by a foreign financial institution. The foreign financial institution is provided with a domestic payment network authorization code, such as the bank identification number approved by the American Banking Association. The BIN along with a prepaid account number is loaded onto a prepaid card corresponding to the prepaid account. A prepaid cardholder can present the prepaid card to a merchant system for completion of a transaction request. The merchant system can be accessed domestically and can recognize the BIN as belonging to the foreign financial institution authorized to transact business on the merchant's domestic payment network. The merchant can seek satisfaction of the transaction request by submitting the transaction request to an acquirer that can forward the transaction request to the foreign financial institution for processing. The foreign financial institution can provide funds to the merchant system to satisfy the transaction request, and the provided funds can be converted to the currency of the country in which the merchant system is accessed by the prepaid cardholder.

13.   **U.S. Patent Application Publication No. 2003/0130907 to Karas** *et al.* (the '907 Published Application). The '907 Published Application is directed to electronic gift linking. More particularly, the '907 Published Application teaches a method for creating an electronic greeting card that references a gift. In one step, a selection of the electronic greeting card is received from a sender of that greeting card. Identification of the gift is received. A code indicative of the gift is created, whereby the code facilitates retrieving information about the gift. The code is embedded in the electronic greeting card.

Accordingly, the '907 Published Application teaches an apparatus and method for embedding electronic gifts and gift information in electronic greeting cards (eCards). A sender of the eCard can select the electronic gift during the eCard creation process. The

receiver redeems the electronic gift or otherwise receives status after receiving it in the card. Electronic gifts can include any tangible gift, a credit in a stored value fund, a foreign currency credit in the stored value fund, a prepaid credit or debit card, a prepaid phone card, promotional points, airline mileage credits, a gift certificate for one or more retailers, and a separately delivered negotiable instrument. The prepaid credit or debit cards are backed by a credit card company and are usable like a credit card for purchases up to a specified amount. For example, a $50 MasterCard™ prepaid credit card can be issued that is good for any goods or services offered by a merchant that accepts MasterCard™ until the $50 credit is spent. The tangible gifts are referenced in the eCard and certain status information is available.

14.   **U.S. Patent Application Publication No. 2004/0007618 to Oram** *et al.* (the '618 Published Application). The '618 Published Application is directed to a prepaid credit card method. More particularly, the '618 Published Application teaches methods for distributing and activating prepaid credit cards. The prepaid credit cards are made available to consumers in various locations, including retail outlets, department stores, financial institutions, and other convenient places. Consumers purchase a prepaid credit card in a desired denomination and then activate the card. The card can be activated over the phone, in combination with a purchase, or at a special kiosk. Once the card has been activated, the consumer can use the card as a normal credit or debit card. When the initial value of the card is depleted, the card can be refilled with additional funds. Thus, the prepaid credit card process allows a consumer to purchase a card in a predetermined denomination. The consumer can then activate the card by making a purchase with the card. When making the activating purchase, the consumer provides the merchant with the prepaid card and a personal identification number ("PIN") obtained from the prepaid card packaging. The merchant is equipped with a point-of-sale terminal that will activate the card. Activation is carried out by sending information read from the magnetic strip on the card to a processing center along with the PIN. Once the card has been activated, it can be used as a regular credit/debit card for purchases in any location that accepts these types of cards.

15. **U.S. Patent Application Publication No. 2004/0039694 to Dunn *et al.*** (the '694 Published Application). The '694 Published Application is directed to a system and method for facilitating a subsidiary card account with controlled spending capability. More particularly, the '694 Published Application teaches a system and method for facilitating a subsidiary account with parental control of one or more spending limits. The system facilitates provision of funds to a subsidiary account and control of the spending of subsidiary account by the parent through establishment or modification of one or more spending limits. For example, spending limits can be configured for modifying a spending capacity so as to affect, for example, amount per transaction, per day, during a predetermined time period, at a particular merchant, at a particular chain of merchants, at a type of industry, in accordance with a predetermined rate of increase or decrease over time, number of transactions during any time period and/or any combination thereof. A parent can establish or modify one or more spending limits through suitable communication means such as a telephone, pager, computer, digital communications device, television, personal digital assistant, facsimile machine, or other suitable device.

16. **U.S. Patent Application Publication No. 2004/0054590 to Redford *et al.*** (the '590 Published Application). The '590 Published Application is directed to a method and system for managing limited use coupon and coupon prioritization. More particularly, the system allows an electronic coupon or reward to be redeemed a specific number of times. The specific number of times can range from one to infinity. The system can automatically resolve any redemption conflict associated with the concurrent redemption of electronic coupon(s) and paper-based coupon(s) by using certain predefined rules and logic.

17. **U.S. Patent Application Publication No. 2004/0083172 to Wiederin** (the '172 Published Application). The '172 Published Application is directed to prepaid transaction tracking. More particularly, the prepaid transaction tracking system allows, for example, entities, such as businesses, individuals, or the like, to have the ability to identify, track and maintain information about prepaid transactions. For example, with respect to prepaid calling cards, a calling card user purchases a prepaid calling card. Then, for example,

at the time of purchase, or upon first use of the card, the calling card, or more specifically, for example, an identifier on the calling card, is associated with a profile stored on a server. Therefore, every time a call is made, the server records billing information associated with the call, such as the time and date of call, the length of the call, the originating phone number of the call, the terminating number of the call, or any other information relevant to the transaction. The billing information associated with the call is then stored on the server, which can be accessed by, for example, an accountant at the user's company.

18.   **U.S. Patent Application Publication No. 2004/0143527 to Benkert *et al.*** (the '527 Published Application). The '527 Published Application is directed to a system and method for facilitating a subsidiary card account. More particularly, the '527 Published Application teaches a system and method for providing a flexible limit subsidiary account that can be issued by a Foreign Financial Institution. The system and method can allow a parent to provide funds to a subsidiary account and to control the spending of the subsidiary account or spending capacity. The card account can be issued at the request of the parent who can retain the ability to define, modify, and/or terminate the spending and/or debt accumulation limits for the subsidiary card account. The system can be configured to provide the ability for parents to eliminate risks associated with fluctuations in currency exchange rates by committing to fixed automatic long-term charges at a fixed foreign exchange rate for a fixed term.

19.   **U.S. Patent Application Publication No. 2005/0097039 to Kulcsar *et al.*** (the '039 Published Application). The '039 Published Application is directed to a multiple credit card management system. More particularly, a method for coordinating the management of credit between an Internet user and a plurality of lending institutions via the Internet includes the step of receiving account information on at least one credit account from the plurality of lending institutions or the Internet user. The account information is stored in a database. Selection criteria is received from the Internet user specifying conditions under which each of the at least one credit account is authorized to be used. A request is received from a merchant for authorization of a transaction. The request is processed. For example,

one of the at least one credit account is selected to be used for the transaction. In addition, the account information corresponding to the selected account is transmitted to the lending institution associated with the selected account, and an authorization status is received from the lending institution. A different account is selected to request authorization from the lending institution associated with the selected account if the authorization status is a denial, and the authorization status is transmitted to the merchant.

20.   **U.S. Patent Application Publication No. 2005/0102234 to Devine** (the '234 Published Application). The '234 Published Application is directed to managing attempts to initiate authentication of electronic commerce card transactions. More particularly, to encourage widespread implementation of an electronic commerce card authentication system by the numerous different card issuers and merchants, the card association assigns liability for fraudulent transaction based upon a party's compliance with the authentication system. To enable such a feature, the card processing system includes the ability to track and record attempts by merchants to initiate authentications, even in circumstances where the card issuer does not support authentication or can not authenticate the card information its receives. A directory server determines whether a card account is capable of being authenticated. If the card issuer cannot authenticate the card account, the directory server instructs the merchant system to attempt authentication with an alternate access control server. The alternate access control server is adapted to communicate an authentication response message with the merchant system indicating that the merchant system attempted an authentication.

21.   **U.S. Patent Application Publication No. 2005/0145691 to Dillard** (the '691 Published Application). The '691 Published Application is directed to a Reprove Prepaid Credit Card. The Reprove Prepaid Credit Card is a prepaid credit card that can be used to purchase goods and services without the hassle and red tape that is associated with the traditional credit card. It is a prepaid card that requires no bank account, no credit check, and no waiting period to receive. Some individuals are unable to obtain a credit card due to credit unworthiness, and some simply do not wish to pay the interest associated with use of a credit card. The Reprove Prepaid Credit Card is for those individuals who desire the benefit of a

credit card, but are unable to obtain a traditional credit card. More particularly, the prepaid card uses an electronic system (process server) for issuance, activation, tracking activity and balances. Networking allows the card user to purchase a card thru a bank, retail establishment, or other agencies, select an increment and card is automatically activated and can be used for immediate purchase. The card can be used to purchase a wide range of goods and services, and can be replenished for future use. To prevent fraud or illegal use, a photo or a fingerprint can be programmed into card.

22.   **U.S. Patent Application Publication No. 2005/0177493 to Sung** (the '493 Published Application). The '493 Published Application is directed to a system and method for operating a gift certificate on the basis of credit card transactions. More particularly, the '493 Published Application teaches a system and method for operating a credit card gift certificate based on credit card transactions. According to the method for operating the credit card gift certificate, a credit card gift certificate server adds the limit of the credit card gift certificate corresponding to an amount of money printed on the credit card gift certificate to the transaction limit of a credit card of a credit card user. The credit card user uses the amount of money of the gift certificate through the credit card transactions within the additionally configured limit of the credit card transaction. An amount obtained by subtracting the limit of the gift certificate from an amount paid by the credit card is determined as a payment amount to be paid by the user on a credit card bill that is sent to the user.

23.   **U.S. Patent Application Publication No. 2005/0216391 to Tews** (the '391 Published Application). The '391 Published Application is directed to a system and method of on-line merchandising. More particularly, '391 Published Application teaches a system and method for on-line merchandising that utilizes a gaming format that includes the on-line purchase of a pre-determined number of bids each representing an equal opportunity for being awarded pre-selected merchandise. Any customer having purchased one or more bids from a bid pool will be awarded the merchandise at a reduced price by holding a randomly selected winning bid. An included distribution format comprises the additional awarding of

pre-selected merchandise; or a substantial equivalent thereof, to any customer having purchased a quantity of bids with a collective monetary value that is at least substantially equal to the purchase price of the pre-selected merchandise.

24.　**U.S. Patent Application Publication No. 2005/0228717 to Gusler** *et al.* (the '717 Published Application). The '717 Published Application is directed to a system and method for brand name gift card exchange. More particularly, the system and method provide for exchanging a gift card. Data associated with a first gift card is provided. The data associated with the first gift card is validated. Either a money rebate associated with the first gift card or a second gift card is selected. The first gift card is exchanged for either a money rebate or the second gift card. An exchange fee is generated by both the vendor associated with the gift card and the company performing the exchange.

25.　**U.S. Patent Application Publication No. 2005/0273392 to Ahn** (the '392 Published Application). The '392 Published Application is directed to a method for circulating an electronic gift certificate in online and offline systems. More particularly, the '392 Published Application teaches an electronic gift certificate circulating method for a gift certificate service system including a gift certificate database and a gift certificate service server to manage sales of the electronic gift certificates according to requests by a communication terminal through wired and wireless networks. A user's purchase request is received from the communication terminal. A settlement state of the electronic gift certificate bought by the user is checked. The electronic gift certificate bought by the user is settled. The bought electronic gift certificate is issued to the user when the user requests settlement. The issued gift certificate information is stored in the gift certificate database. The user is notified in a message format of the gift certificate purchase particulars and gift certificate information for usage of the corresponding gift certificate.

26.　**U.S. Patent Application Publication No. 2006/0069642 to Doran** *et al.* (the '642 Published Application). The '642 Published Application is directed to methods and systems for exchanging and or transferring various forms of value. More particularly, the

'642 Published Application teaches methods and systems for exchanging various forms of value, including coins, currency, credit, debit, and/or bank account funds, for prepaid cash cards, credit cards, phone cards, and the like. A value exchange machine includes a coin input region, a coin sorting/counting apparatus, a card reader, and a communications facility configured to communicate with a remote computer network. A value exchange system includes one or more of the value exchange machines connected to one or more remote computers via a communications link. A user wishing to purchase, for example, a prepaid cash card can visit one of the value exchange machines, select the desired transaction, and pay for the card with coins, currency, a credit card, a debit card, and/or bank account funds. After confirming payment, the value exchange machine dispenses the card to the user.

27. **European Patent Application Publication No. EP 1 359 549 to Daouk** (the '549 Published Application). The '549 Published Application is directed to a prepaid credit card. More particularly, the prepaid credit card can be utilized for paying for services or trade transactions in those systems that work by credit cards. The electronic numerical information about the card's serial number and the latest date of performed transactions is enclosed and registered into the card. On one side of the card, there is a section on which is plotted visual information about the card's serial number and the latest date of performed transactions. The section is also covered by a masking layer that can be erased.

28. **Visa™ Prepaid Gift Card Program Brochure** (the "Visa™ Gift Card Brochure"). The Visa™ Gift Card Brochure describes the Visa™ Gift Card program. The prepaid Visa™ Gift Card can be sold through financial institutions and the like for use by cardholders to purchase services and merchandise at any location that accepts Visa™ debit cards, including Internet and mail order/telephone order merchants. The Visa™ Gift Card program uses the established Visa™ Debit Processing Service infrastructure and support mechanisms, allowing these financial institutions to easily extend their processing relationship to handle such prepaid card products. The Visa™ Gift Card program includes card management services for issuance and reissuance of card plastics and PIN mailers, multiple funding options, authorization services, browser-based access tools, and cardholder

support services. For example, multi-level daily and monthly Visa™ Gift Card activity reports can be used to reconcile a central funds pool and manage the program by the financial institution. Card inventory management for branches provides a mechanism for managing, ordering, and auditing branch card inventory levels.

B.   THE CLAIMS ARE PATENTABLE OVER THE REFERENCES

1.   Discussion of the Claimed Invention

For at least the following reasons, it is respectfully submitted that the claimed subject matter is neither taught nor suggested in the references discussed herein. The present application is directed to, among other things, a system for managing information associated with card products and a method for managing card product information across multiple card processors. According to exemplary embodiments, a single bank agent portal provides an interface to multiple card processors to support administration and management of cards or other card products issued by different entities, such as, for example, financial institutions (e.g., banks) and the like. The bank agent portal can then choose one of the card processors to process information associated with the card products using unique identifying information associated with each card product. The card products can include, for example, gift cards (e.g., bank-issued gift cards), debit cards, and other non-reloadable card products, as well as reloadable card products, such as, for example, health savings account (HSA) cards, flexible spending account (FSA) cards, reloadable payroll cards and the like. By providing a single interface to multiple card processors, a user can effectively and easily manage any or all of these card products and other types of like financial transactions from a single site, regardless of the entity that issued the card.

According to exemplary embodiments, the bank agent portal provides a layer of abstraction between the user and the card processors. In other words, the present invention handles any and all inconsistencies and differences in interfaces, communications, data formats and the like between the various card processors, so that the user need only interact with a single, unified interface. Thus, the user can purchase, manage, and conduct administrative functions for any number of card products from any number of financial

institutions without the need to separately conduct business with each institution (e.g., through each financial institution's website). For example, the user can generate and view summary reports of financial information associated with the card products issued from the different financial institutions.

Independent claim 1 of the present application is directed to an information management system. The information management system of claim 1 includes a computer server. The computer server includes an interface module. The information management system further includes a plurality of card processors in communication with the computer server via the interface module. The computer server is configured to interface with each of the plurality of card processors via the interface module. The computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

Independent claim 6 of the present application is directed to a card product management system. The card product management system of claim 6 includes an agent portal module. The card product management system further includes a plurality of card processors in communication with the agent portal module. The agent portal module is configured to interface with each of the plurality of card processors. The agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

Independent claim 32 of the present application is directed to a method of managing card product information. The method of claim 32 includes the step of interfacing with each of a plurality of card processors. The method further includes the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

2.   **Differences Between Claimed Invention and References**

i.)   **U.S. Patent No. 5,945,653 to Walker *et al.*** (the '653 Patent). The '653 Patent fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '653 Patent fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '653 Patent fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '653 Patent fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '653 Patent fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '653 Patent is directed to a system and method for establishing and executing functions to affect credit card accounts and transactions. More particularly, the system and method enable merchants to offer customers a variety of financing options on an ad hoc basis. It is respectfully asserted that the disclosure of the '653 Patent does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '653 Patent to arrive at the present invention.

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ii.)   **U.S. Patent No. 5,960,412 to Tackbary *et al.*** (the '412 Patent). The '412 Patent fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '412 Patent fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '412 Patent fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '412 Patent fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '412 Patent fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '412 Patent is directed to a method and apparatus for communicating with a card distribution center for management, selection, and delivery of social expression cards. More particularly, the method and apparatus use a computer system for permitting buyers to communicate with a card distribution center for selecting, ordering, and sending social expression cards and for maintaining records of intended recipients, occasion dates and orders made. It is respectfully asserted that the disclosure of the '412 Patent contains no suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '412 Patent to arrive at the present invention.

iii.) **U.S. Patent No. 5,984,180 to Albrecht** (the '180 Patent). The '180 Patent fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '180 Patent fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '180 Patent fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '180 Patent fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '180 Patent fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '180 Patent is directed to method and system for gift credit cards. More particularly, the '180 Patent teaches a system and method for providing purchasable value in the form of a credit instrument. It is respectfully asserted that the disclosure of the '180 Patent does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '180 Patent to arrive at the present invention.

iv.) **U.S. Patent No. 6,594,644 to Van Dusen** (the '644 Patent). The '644 Patent

fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '644 Patent fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '644 Patent fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '644 Patent fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '644 Patent fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '644 Patent is directed to an electronic gift certificate system. More particularly, the system provides an electronic gift certificate system that improves the efficiency and reliability of the redemption process. It is respectfully asserted that the disclosure of the '644 Patent does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '644 Patent to arrive at the present invention.

v.)   **U.S. Patent No. 6,636,833 to Flitcroft** *et al.* (the '833 Patent). The '833 Patent fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '833 Patent fails to teach or suggest an information

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management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '833 Patent fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '833 Patent fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '833 Patent fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '833 Patent is directed to a credit card system and method. More particularly, a credit card system is provided that has the added feature of providing additional limited-use credit card numbers and/or cards. It is respectfully asserted that the disclosure of the '833 Patent does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '833 Patent to arrive at the present invention.

vi.)   **U.S. Patent No. 6,957,746 to Martin** *et al.* (the '746 Patent). The '746 Patent fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '746 Patent fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to

interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '746 Patent fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '746 Patent fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '746 Patent fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '746 Patent is directed to apparatuses and methods for dispensing magnetic cards, integrated circuit cards, and other similar items. More particularly, a card dispensing apparatus includes at least first and second card hoppers and a movable card carriage. It is respectfully asserted that the disclosure of the '746 Patent does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '746 Patent to arrive at the present invention.

vii.)   **U.S. Patent No. 7,014,104 to MacFarlane *et al.* (the '104 Patent).** The '104 Patent fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '104 Patent fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which

the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '104 Patent fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '104 Patent fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '104 Patent fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '104 Patent is directed to a gift matching method. More particularly, a method for electronically transferring an amount of money from an initiator to a receiver is taught. It is respectfully asserted that the disclosure of the '104 Patent does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '104 Patent to arrive at the present invention.

viii.) **U.S. Patent Application Publication No. 2001/0049655 to Bellosguardo** (the '655 Published Application). The '655 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '655 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a

unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '655 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '655 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '655 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '655 Published Application is directed to an anonymous credit card. More particularly, the anonymous credit card has a unique identification number and a card value that is exhausted when the cash amount of the card is expended. It is respectfully asserted that the disclosure of the '655 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '655 Published Application to arrive at the present invention.

ix.)   **U.S. Patent Application Publication No. 2002/0013766 to Kumaki** (the '766 Published Application). The '766 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '766 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is

configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '766 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '766 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '766 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '766 Published Application is directed to a commercial settlement system with prepaid type credit card. More particularly, a commercial settlement system is provided using a novel prepaid credit card that can easily be owned by any one, can be used extensively for transactions like a credit card, and can suppress a criminal risk and damage. It is respectfully asserted that the disclosure of the '766 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '766 Published Application to arrive at the present invention.

x.) **U.S. Patent Application Publication No. 2002/0100797 to Hollingsworth** *et al.* (the '797 Published Application). The '797 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '797 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a

computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '797 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '797 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '797 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '797 Published Application is directed to a gift card envelope. More particularly, the '797 Published Application teaches a gift card supporting a prepaid credit card. It is respectfully asserted that the disclosure of the '797 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '797 Published Application to arrive at the present invention.

xi.) **U.S. Patent Application Publication No. 2002/0032605 to Lee** (the '605 Published Application). The '605 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '605 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an

interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '605 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '605 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '605 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '605 Published Application is directed to a system and method for providing a selectable gift certificate. More particularly, the '605 Published Application teaches a system for providing gift certificates that comprises a user terminal and a server coupled to the user terminal via the Internet. The server is configured to provide to the user terminal an interface for enabling a user of the user terminal to purchase a first gift certificate that is redeemable by the recipient for a second gift certificate. It is respectfully asserted that the disclosure of the '605 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '605 Published Application to arrive at the present invention.

    xii.)   **U.S. Patent Application Publication No. 2002/0194124 to Hobbs** *et al.* (the

'124 Published Application). The '124 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '124 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '124 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '124 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '124 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '124 Published Application is directed to a system and method for a prepaid card issued by a foreign financial institution. More particularly, the '124 Published Application teaches a system and method for providing a reloadable prepaid card account maintained by a foreign financial institution. It is respectfully asserted that the disclosure of the '124 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '124 Published Application to arrive at the present invention.

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xiii.)   **U.S. Patent Application Publication No. 2003/0130907 to Karas *et al.* (the** '907 Published Application). The '907 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '907 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '907 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '907 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '907 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '907 Published Application is directed to electronic gift linking. More particularly, the '907 Published Application teaches a method for creating an electronic greeting card that references a gift. It is respectfully asserted that the disclosure of the '907 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '907 Published Application to arrive at the present invention.

xiv.)   **U.S. Patent Application Publication No. 2004/0007618 to Oram** *et al.* (the '618 Published Application). The '618 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '618 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '618 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '618 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '618 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '618 Published Application is directed to a prepaid credit card method. More particularly, the '618 Published Application teaches methods for distributing and activating prepaid credit cards. Consumers purchase a prepaid credit card in a desired denomination and then activate the card. The card can be activated over the phone, in combination with a purchase, or at a special kiosk. It is respectfully asserted that the disclosure of the '618 Published Application

does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '618 Published Application to arrive at the present invention.

xv.) **U.S. Patent Application Publication No. 2004/0039694 to Dunn *et al.* (the** '694 Published Application). The '694 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '694 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '694 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '694 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '694 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '694 Published Application is directed to a system and method for facilitating a subsidiary card account with controlled spending capability. More particularly, the '694 Published Application teaches a

system and method for facilitating a subsidiary account with parental control of one or more spending limits. It is respectfully asserted that the disclosure of the '694 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '694 Published Application to arrive at the present invention.

xvi.) **U.S. Patent Application Publication No. 2004/0054590 to Redford** *et al.* (the '590 Published Application). The '590 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '590 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '590 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '590 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '590 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '590 Published

Application is directed to a method and system for managing limited use coupon and coupon prioritization. More particularly, the system allows an electronic coupon or reward to be redeemed a specific number of times. It is respectfully asserted that the disclosure of the '590 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '590 Published Application to arrive at the present invention.

       xvii.) **U.S. Patent Application Publication No. 2004/0083172 to Wiederin** (the '172 Published Application). The '172 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '172 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

       With regard to independent claim 6, the '172 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

       With regard to independent claim 32, the '172 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '172 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '172 Published Application is directed to prepaid transaction tracking. More particularly, the prepaid transaction tracking system allows, for example, entities, such as businesses, individuals, or the like, to have the ability to identify, track and maintain information about prepaid transactions. It is respectfully asserted that the disclosure of the '172 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '172 Published Application to arrive at the present invention.

xviii.) **U.S. Patent Application Publication No. 2004/0143527 to Benkert *et al.*** (the '527 Published Application). The '527 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '527 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '527 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '527 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '527 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance

with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '527 Published Application is directed to a system and method for facilitating a subsidiary card account. More particularly, the '527 Published Application teaches a system and method for providing a flexible limit subsidiary account that can be issued by a Foreign Financial Institution. It is respectfully asserted that the disclosure of the '527 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '527 Published Application to arrive at the present invention.

xix.)   **U.S. Patent Application Publication No. 2005/0097039 to Kulcsar** *et al.* (the '039 Published Application). The '039 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '039 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '039 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '039 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '039 Published Application fails

to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '039 Published Application teaches a method for coordinating the management of credit between an Internet user and a plurality of lending institutions via the Internet. Selection criteria is received from the Internet user specifying conditions under which each of at least one credit account is authorized to be used. A request from a merchant for authorization of a transaction is received and processed. For example, one of the at least one credit account is selected by the user to be used for the transaction. In addition, the account information corresponding to the selected account is transmitted to the lending institution associated with the selected account, and an authorization status is received from the lending institution. However, if the authorization status is a denial, then a different account can be selected by the user to request authorization from the lending institution associated with the selected account. Thus, the '039 Published Application is directed to a system for managing multiple credit cards. It is respectfully asserted that the disclosure of the '039 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '039 Published Application to arrive at the present invention.

xx.) **U.S. Patent Application Publication No. 2005/0102234 to Devine** (the '234 Published Application). The '234 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '234 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '234 Published Application fails to teach or

suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '234 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '234 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '234 Published Application is directed to managing attempts to initiate authentication of electronic commerce card transactions. More particularly, to encourage widespread implementation of an electronic commerce card authentication system by the numerous different card issuers and merchants, the card association assigns liability for fraudulent transaction based upon a party's compliance with the authentication system. Accordingly, a card processing system includes the ability to track and record attempts by merchants to initiate authorizations. It is respectfully asserted that the disclosure of the '234 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '234 Published Application to arrive at the present invention.

xxi.)   **U.S. Patent Application Publication No. 2005/0145691 to Dillard** (the '691 Published Application). The '691 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '691 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is

configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '691 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '691 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '691 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '691 Published Application is directed to a Reprove Prepaid Credit Card. The Reprove Prepaid Credit Card is a prepaid credit card that can be used to purchase goods and services without the hassle and red tape that is associated with the traditional credit card. It is respectfully asserted that the disclosure of the '691 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '691 Published Application to arrive at the present invention.

xxii.) **U.S. Patent Application Publication No. 2005/0177493 to Sung** (the '493 Published Application). The '493 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '493 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the

plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '493 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '493 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '493 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '493 Published Application is directed to a system and method for operating a gift certificate on the basis of credit card transactions. More particularly, the '493 Published Application teaches a system and method for operating a credit card gift certificate based on credit card transactions. It is respectfully asserted that the disclosure of the '493 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '493 Published Application to arrive at the present invention.

xxiii.) **U.S. Patent Application Publication No. 2005/0216391 to Tews (the '391 Published Application).** The '391 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '391 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an

interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '391 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '391 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '391 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '391 Published Application is directed to a system and method of on-line merchandising. More particularly, '391 Published Application teaches a system and method for on-line merchandising that utilizes a gaming format that includes the on-line purchase of a pre-determined number of bids each representing an equal opportunity for being awarded pre-selected merchandise. It is respectfully asserted that the disclosure of the '391 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '391 Published Application to arrive at the present invention.

xxiv.) **U.S. Patent Application Publication No. 2005/0228717 to Gusler *et al.* (the '717 Published Application).** The '717 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the

'717 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '717 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '717 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '717 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '717 Published Application is directed to a system and method for brand name gift card exchange. More particularly, the system and method provide for exchanging a gift card. It is respectfully asserted that the disclosure of the '717 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '717 Published Application to arrive at the present invention.

xxv.) **U.S. Patent Application Publication No. 2005/0273392 to Ahn** (the '392 Published Application). The '392 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the

'392 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '392 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '392 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '392 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '392 Published Application is directed to a method for circulating an electronic gift certificate in online and offline systems. More particularly, the '392 Published Application teaches an electronic gift certificate circulating method for a gift certificate service system including a gift certificate database and a gift certificate service server to manage sales of the electronic gift certificates according to requests by a communication terminal through wired and wireless networks. It is respectfully asserted that the disclosure of the '392 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the '392 Published Application to arrive at the present invention.

xxvi.) **U.S. Patent Application Publication No. 2006/0069642 to Doran *et al.* (the** '642 Published Application). The '642 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '642 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '642 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '642 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '642 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '642 Published Application is directed to methods and systems for exchanging and or transferring various forms of value. More particularly, the '642 Published Application teaches methods and systems for exchanging various forms of value, including coins, currency, credit, debit, and/or bank account funds, for prepaid cash cards, credit cards, phone cards, and the like. It is respectfully asserted that the disclosure of the '642 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to

modify the disclosure of the '642 Published Application to arrive at the present invention.

xxvii.) **European Patent Application Publication No. EP 1 359 549 to Daouk** (the '549 Published Application). The '549 Published Application fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the '549 Published Application fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the '549 Published Application fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the '549 Published Application fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the '549 Published Application fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the '549 Published Application is directed to a prepaid credit card. More particularly, the prepaid credit card can be utilized for paying for services or trade transactions in those systems that work by credit cards. It is respectfully asserted that the disclosure of the '549 Published Application does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in

the art to modify the disclosure of the '549 Published Application to arrive at the present invention.

xxviii.) **Visa™ Prepaid Gift Card Program Brochure** (the "Visa™ Gift Card Brochure"). The Visa™ Gift Card Brochure fails to teach or suggest all of the elements of the present application. For example, with regard to independent claim 1, the Visa™ Gift Card Brochure fails to teach or suggest an information management system that comprises a plurality of card processors in communication with a computer server via an interface module, in which the computer server is configured to interface with each of the plurality of card processors via the interface module, and in which the computer server is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 6, the Visa™ Gift Card Brochure fails to teach or suggest a card product management system that comprises a plurality of card processors in communication with an agent portal module, in which the agent portal module is configured to interface with each of the plurality of card processors, and in which the agent portal module is configured to choose one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

With regard to independent claim 32, the Visa™ Gift Card Brochure fails to teach or suggest a method of managing card product information that comprises the step of interfacing with each of a plurality of card processors. Furthermore, the Visa™ Gift Card Brochure fails to teach or suggest the step of selecting one of the plurality of card processors in accordance with a unique identifier associated with a card product to process information associated with the card product.

In contrast to exemplary embodiment of the present invention, the Visa™ Gift Card Brochure describes the Visa™ Gift Card Program in which prepaid Visa™ Gift Cards can be sold through financial institutions and the like for use by cardholders to purchase services and merchandise at any location that accepts Visa™ debit cards, including Internet and mail order/telephone order merchants. It is respectfully asserted that the disclosure of the Visa™

Gift Card Brochure does not contain or otherwise provide any suggestion or motivation to a person of ordinary skill in the art to modify the disclosure of the Visa™ Gift Card Brochure to arrive at the present invention.

C.   CONCLUSION

All of the references discussed above fail to teach or suggest all of elements of the present invention. In addition, none of the references provide direction or motivation to a person of ordinary skill in the art to combine or modify any of these references to arrive at the Applicants' invention. In view of the foregoing, it is respectfully submitted that all of the pending claims are patentable over the references discussed above, whether considered alone or in combination.